

ORIGINAL

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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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COMMISSIONERS

GARY PIERCE, Chairman

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2011 MAY 20 P 12:03

AZ CORP COMMISSION
DOCKET CONTROL

MAY 20 2011

DOCKETED BY

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IN THE MATTER OF THE
APPLICATION OF GRAHAM COUNTY
UTILITIES INC.'S APPLICATION FOR
APPROVAL OF ITS DSM PROGRAMS

DOCKET NOS. G-02527A-09-0088, G-
02527A-09-0032, W-02527A-09-0201, W-
02527A-09-0033, AND E-01749A-09-0087

**SWEEP COMMENTS ON THE
STAFF REPORT AND
RECOMMENDED ORDER**

**COMMENTS OF THE SOUTHWEST ENERGY EFFICIENCY PROJECT
ON GRAHAM COUNTY UTILITIES INC.'S APPLICATION
FOR APPROVAL OF ITS DSM PROGRAMS**

1 The Southwest Energy Efficiency Project ("SWEEP") appreciates the opportunity to submit
2 comments in response to the Recommended Order filed by Staff on April 12, 2011, regarding
3 Graham County Utilities Inc.'s ("GCU" or "Cooperative") Application for Approval of its DSM
4 Programs.

5
6 SWEEP believes that it is appropriate and is in the public interest for GCU to offer some DSM
7 energy efficiency services to help its members reduce their energy use and costs. SWEEP
8 acknowledges that GCU is a small utility (approximately 5,255 gas customers) and as such the
9 Gas Energy Efficiency Standard does not apply to GCU. However, SWEEP believes that all
10 utilities in Arizona, even small utilities, should offer some level of DSM energy efficiency
11 services to assist customers in saving energy and reducing their energy bills.

12
13 Therefore, SWEEP supports the DSM plan the Cooperative filed with the Commission on
14 August 30, 2010, pursuant with Decision No. 71690, and respectfully disagrees with Staff's
15 recommendation in the Recommended Order. Specifically, SWEEP urges Commission approval
16 of GCU's proposed DSM Plan to offer (1) a weatherization program, with low-income customers
17 receiving the majority of the weatherization funding; and (2) an education program. The total
18 cost of the DSM portfolio budget, as proposed by GCU, would be \$25,079 including funding for
19 both programs plus administrative costs.

20
21 To address Staff's concerns about administrative costs and reaching GCU customers effectively,
22 we believe that the Cooperative's proposal to deliver energy efficiency measures by
23 piggybacking on the existing delivery system and network of an effective community
24 organization such as the Southeastern Arizona Community Action Program ("SEACAP") will

1 ensure that administrative costs are kept to a minimum and resources are efficiently delivered.
2 This approach will ensure that the limited resources are focused on providing the most value to
3 GCU members by achieving energy bill savings for GCU customers.

4
5 SWEEP also supports GCU's revised proposal for a DSM adjustor consisting of a charge of
6 \$0.02 per therm, with a \$0.50 per month Residential cap and a \$5.00 per month Non-residential
7 cap. SWEEP recommends this approach rather than the original GCU-proposed fixed charge of
8 \$0.35 per month for Residential customers and \$1.50 per month for Non-residential customers.
9 SWEEP generally prefers a per-therm charge for the DSM adjustor.

10
11 SWEEP has prepared Proposed Amendment #1 (attached) to address these issues.

12
13 Thank you for the opportunity to submit these comments.
14
15
16

17 Respectfully submitted this 20th day of May 2011 by:

18
19
20 _____
21 Jeff Schlegel & Ellen Zuckerman
22 Southwest Energy Efficiency Project
23

24 ORIGINAL and thirteen (13) copies filed this 20th day of May 2011, with:

25
26 Docket Control
27 ARIZONA CORPORATION COMMISSION
28 1200 West Washington Street
29 Phoenix, Arizona 85007

30 COPIES of the foregoing sent via email and/or mail this 20th day of May 2011, to:

31
32 All Parties of Record
33

1 **Graham County Utilities, Inc. Application for Approval of its DSM Programs**
2 **Docket Nos. G-02527A-09-0088, G-02527A-09-0032, W-02527A-09-0201,**
3 **W-02527A-09-0033, and E-01749A-09-0087**

4 **Proposed Amendment #1**

5
6 **Page 6, Line 2 STRIKE:**

7 “not”
8
9

10 **Page 6, Line 6 STRIKE:**

11 “zero and that the DSM requirements of Decision No. 71690 be waived and reexamined at
12 Graham’s next rate proceeding.”
13

14 **and INSERT:**

15 “\$0.02 per therm, with a \$0.50 per month Residential cap and a \$5.00 per month Non-residential
16 cap.”
17
18

19 **Page 6, Line 8 INSERT:**

20 “IT IS FURTHER ORDERED THAT the proposed Graham County Utility DSM programs
21 including a weatherization program and an education program are approved.”
22
23

24 Make all conforming changes.